# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a Delaware corporation,		
Plaintiff,		
v.		
FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC., a Delaware corporation, and FAIRCHILD SEMICONDUCTOR CORPORATION, a Delaware corporation,	C.A. No. 04-1371 JJF	
Defendants.		
POWER INTEGRATIONS' [PROPOSED] SPECIAL VERDICT AND INTERROGATORIES TO THE JURY – INFRINGEMENT AND DAMAGES		
We, the jury, unanimously find as follows:		
INFRINGEMENT OF POWER INTEGRATIONS' '876 PATENT		
Infringement of the '876 Patent		
1. Do you find by a preponderance	of the evidence that Fairchild has literally	
infringed Claim 1 of the '876 Patent?	(A "YES" answer to this question is a	
finding for Power Integrations. A "N	IO" answer is a finding for Fairchild.)	
YES	NO	
2. If you answered "NO" to question	n 1, do you find by a preponderance of the	
evidence that Fairchild nevertheless infringes Claim 1 of the '876 patent under the		
doctrine of equivalents? (A "YES" a	inswer to this question is a finding for Power	
Integrations. A "NO" answer is a finding for Fairchild.)		
YES	NO	

# Willful Infringement of the '876 Patent

3. If	you answered "YES" to either question 1 or question 2, do you find by clear		
•	and convincing evidence that Fairchild's infringement of Claim 1 of the '876		
_	was willful? (A "YES" answer to this question is a finding for Power		
Integrations. A "NO" answer is a finding for Fairchild.)			
	YES NO		
	125 110		
INFRINGEM	IENT OF POWER INTEGRATIONS' '851 PATENT		
Infrin	Infringement of the '851 Patent		
4. Do you find by a preponderance of the evidence that Fairchild has literally			
infring	infringed Claim 1 of the '851 Patent? (A "YES" answer to this question is a		
finding	g for Power Integrations. A "NO" answer is a finding for Fairchild.)		
	YES NO		
5. If :	you answered "NO" to question 4, do you find by a preponderance of the		
eviden	evidence that Fairchild nevertheless infringes Claim 1 of the '851 patent under the		
doctrir	doctrine of equivalents? (A "YES" answer to this question is a finding for Power		
	Integrations. A "NO" answer is a finding for Fairchild.)		
	urons. 11 110 unswer is a ringing for randing.		
	YES NO		
*****	II 6		
Willfu	ll Infringement of the '851 Patent		
6. If y	you answered "YES" to either question 4 or question 5, do you find by clear		
and convincing evidence that Fairchild's infringement of Claim 1 of the '851			
patent was willful? (A "YES" answer to this question is a finding for Power			
Integra	ations. A "NO" answer is a finding for Fairchild.)		
	YES NO		

#### **INFRINGEMENT OF POWER INTEGRATIONS' '366 PATENT**

### **Infringement of the '366 Patent**

7. Do you find by a preponderance of the evidence that Fairchild has literally infringed Claim 14 of the '366 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)		
YES NO		
8. If you answered "NO" to question 7, do you find by a preponderance of the evidence that Fairchild nevertheless infringes Claim 14 of the '366 patent under the doctrine of equivalents? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)		
YES NO		
Willful Infringement of the '366 Patent		
9. If you answered "YES" to either question 7 or question 8, do you find by clear		
and convincing evidence that Fairchild's infringement of Claim 14 of the '366		
patent was willful? (A "YES" answer to this question is a finding for Power		
Integrations. A "NO" answer is a finding for Fairchild.)		
YES NO		
INFRINGEMENT OF POWER INTEGRATIONS' '075 PATENT		
10. Do you find by a preponderance of the evidence that Fairchild has literally		
infringed Claim 5 of the '075 Patent? (A "YES" answer to this question is a		
finding for Power Integrations. A "NO" answer is a finding for Fairchild.)		
YES NO		

# Willful Infringement of the '075 Patent

11. If you answered "YES" as to question 10, do you find by clear and convincing evidence that Fairchild's infringement of Claim 5 of the '075 patent was willful?  (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)  YES NO  DAMAGES DUE TO POWER INTEGRATIONS		
DAME TO TOWER INTEGRATIONS		
Damages for Infringement of the '876, '851,'366, and/or '075 Patents		
12. If you have found that Fairchild has infringed at least one asserted claim from		
any of the '876, '851, '366, and/or '075 Patents, do you find by a preponderance		
of the evidence that Power Integrations suffered actual damages as a result of		
Fairchild's infringement? (A "YES" answer to this question is a finding for		
Power Integrations. A "NO" answer is a finding for Fairchild.)		
YES NO		
13. If you answered "YES" to question 12, state the type and amount of damages		
you find Power Integrations to have proven by a preponderance of the evidence:		
(A) Lost Profits from Lost Sales ('876 and/or '851 patent only):		
(B) Past Lost Profits from Price Erosion:		
(C) Future Lost Profits from Price Erosion:		
(D1) Reasonable Royalty (in addition to Lost Profits from Lost Sales):		
(D2) Reasonable Royalty (if no Lost Profits from Lost Sales):		

14. If you answered "YES" to question 12, please state the applicable royalty

rates that should apply to each pate	ent you found Fairchild infringed:
'876 Patent	'851 Patent
'366 Patent:	'075 Patent
You must each sign this Verdict F	Form: Dated:
(foreperson)	

#### **CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2006, I electronically filed with the Clerk of Court POWER INTEGRATIONS' [PROPOSED] SPECIAL VERDICT AND INTERROGATORIES TO THE JURY – INFRINGEMENT AND DAMAGES using CM/ECF which will send electronic notification of such filing(s) to the following Delaware counsel. In addition, the filing will also be sent via hand delivery:

Steven J. Balick, Esq. John G. Day, Esq. Ashby & Geddes 222 Delaware Avenue, 17th Floor P. O. Box 1150 Wilmington, DE 19899

I hereby certify that on September 1, 2006, I have served by Federal Express, the document(s) to the following non-registered participants:

G. Hopkins Guy, III Bas de Blank Orrick, Herrington & Sutcliffe, LLP 1000 Marsh Road Menlo Park, CA 94025

Attorneys for Defendants FAIRCHILD SEMICONDUCTOR INTERNATIONAL, INC. and FAIRCHILD SEMICONDUCTOR **CORPORATION** 

/s/ William J. Marsden, Jr.

William J. Marsden, Jr. (marsden@fr.com)